

## Exhibit E: Declaration of Maziano S. Reliford, III

Romaine C. Marshall (09654)  
Jose A. Abarca (12762)  
Jonathan E. Schmalfeld (admitted *pro hac vice*)  
POL SINELLI PC  
2825 E Cottonwood Pkwy, Suite 500  
Salt Lake City, UT 84121  
Telephone: (801) 999-3504  
[rmarshall@polsinelli.com](mailto:rmarshall@polsinelli.com)  
[jabarca@polsinelli.com](mailto:jabarca@polsinelli.com)  
[jschmalfeld@polsinelli.com](mailto:jschmalfeld@polsinelli.com)

*Attorneys for Defendants iX Global LLC, Joseph A. Martinez,  
and Travis A. Flaherty*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

DIGITAL LICENSING INC. dba DEBT Box,  
a Wyoming corporation, et al.,

Defendants/Relief Defendants.

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**DECLARATION OF MAZIANIO S.  
RELIFORD, III IN SUPPORT OF IX  
GLOBAL DEFENDANTS' PETITION  
FOR FEES**

Case No. 2:23-cv-00482-RJS-DBP  
Chief Judge Robert J. Shelby  
Magistrate Judge Dustin B. Pead

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I, Mozianio "Trey" S. Reliford, III, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am over twenty-one years of age and am an attorney licensed by the states of Tennessee, #036170 and New York #5411814.
2. I make this Declaration in support of the Defendants iX Global LLC, Joseph A.

Martinez, and Travis A. Flaherty (the “iX Global Defendants”) Petition for Fees.

3. I have personal knowledge of the matters set forth herein.

4. I am an attorney based in Tennessee, and my practice specializes in commercial litigation. I have extensive experience in every facet of litigation, including jury trials, arbitrations, injunctions, motion practice and mediations.

5. My time in this matter was billed at a rate of \$605/h. This is a discounted rate for my work, and is approximately 20% below the national rate which I bill at for similar matters to the instant matter.

6. I have reviewed the Court’s Memorandum Decision and Order dated March 18, 2024. Dkt. # 275.

7. I understand that the Court Ordered the iX Global Defendants to submit a petition for fees setting forth in detail all attorneys’ fees and legal costs arising from the TRO and appointment of the Receiver. *Id.* at pg. 77.

8. I further understand that the fees submitted for payment specifically exclude work attributable to the Motions to Dismiss filed by the defendants in this matter (including the iX Global Defendants) and work done in preparing the responses to the Commission’s Response to the Order to Show Cause. *Id.* at pg. 77-78.

9. I have carefully reviewed my billing in this matter, and have removed from the Court’s consideration all billing which was for work not arising from the TRO or Receiver.

10. Where a billing entry contained time attributable the TRO/ Receiver and other matters explicitly excluded from the Court’s Order or otherwise unrelated to the TRO/ Receiver, I have revised the time for that entry to only include time attributable to the TRO/ Receiver.

11. I can confirm that, to the best of my ability, for all the entries which I am the listed billing attorney on **Exhibit A** attached to iX Global Defendants Petition for Fees, only my time and expenses which are attributable to the TRO/ Receiver are included.

I declare under penalty of perjury that the foregoing is true and correct.

s/ *Trey Reliford*  
Moziano “Trey” S. Reliford, III